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COOLEY LLP
WHITTY SOMVICHIAN (194463)
(wsomvichian@cooley.com)
KRISTINE VAN HAMERSVELD (278745)
(kvanhamersveld@cooley.com)
101 California Street, 5th Floor
San Francisco, CA 94111-5800
Telephone: (415) 693-2000
Facsimile: (415) 693-2222

Attorneys for Defendant
FACEBOOK, INC.

FILED-Filing
APR 17 2012
RICHARD W. WIENING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
ADR

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CV 12-01894 HRL

GLYNNIS BOHANNON, individually and on
behalf of her minor child I.B. and on behalf of
all others similarly situated,

Plaintiffs,

v.

FACEBOOK, INC.,

Defendant.

Case No.

California Superior Court,
County of Santa Clara
Case No. 112CV219256

**DECLARATION OF BILL RICHARDSON IN
SUPPORT OF FACEBOOK, INC.'S NOTICE
OF REMOVAL**

I, Bill Richardson, declare as follows:

1. I am employed by Defendant Facebook, Inc. ("Facebook") as Manager, Payment Operations. In that capacity, my job responsibilities include overseeing internal operations related to Facebook Credits. I have personal knowledge of the following facts and if called to testify could and would testify competently thereto.

2. I am informed that the Plaintiffs in this case are seeking to represent other Facebook users as part of a proposed class defined as: "All parents and legal guardians in the United States whose minor children made unauthorized purchases of Facebook Credits from the minor child's Facebook account." (Compl. ¶ 24.)

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3. I am further informed that the Plaintiffs are seeking to recover "restitution and/or disgorgement of funds paid to Facebook" by proposed class members for Facebook Credits. (Compl. ¶ 53.)

4. I queried an internal Facebook system that tracks purchases of Facebook Credits by Facebook users and determined that users who are purportedly aged 13-17 purchased well in excess of \$5,000,000 in Facebook Credits in calendar year 2011.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on April 17, 2012 at Menlo Park, California.

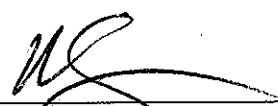
/s/ Bill Richardson
Bill Richardson

FILER'S ATTESTATION

Pursuant to General Order No. 45, § X(B) regarding signatures, I attest under penalty of perjury that the concurrence in the filing of this document has been obtained from its signatory.

Dated: April 17, 2012

COOLEY LLP
WHITTY SOMVICHIAN (194463)
KRISTINE VAN HAMERSVELD (278745)


Whitty Somvichian (194463)
Attorneys for Defendant
FACEBOOK, INC.

PROOF OF SERVICE
(FRCP 5)

I am a citizen of the United States and a resident of the State of California. I am employed in San Francisco County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley LLP, 101 California Street, 5th Floor, San Francisco, California 94111-5800. On the date set forth below I served the documents described below in the manner described below:

**DECLARATION OF BILL RICHARDSON IN SUPPORT OF
FACEBOOK, INC.'S NOTICE OF REMOVAL**

- (BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at San Francisco, California.
- (BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.
- (BY FACSIMILE) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- (BY OVERNIGHT MAIL) I am personally and readily familiar with the business practice of Cooley LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by _____ for overnight delivery.
- (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

KERSHAW, CUTTER, & RATINOFF, LLP
C. BROOKS CUTTER (121407)
JOHN R. PARKER(257761)
401 Watt Avenue
Sacramento, CA 95864
Telephone: (916) 448-9800
Facsimile: (916) 669-4499

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Executed on April 17, 2012, at San Francisco, California.

Sandra Warren

Sandra Warren

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